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August 19, 2013

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VIA ECF

Chief Magistrate Judge Steven M. Gold
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Ravenell, et al. v. Avis Budget Car Rental, LLC, et al.*
Index No. 08-cv-02113

Dear Magistrate Judge Gold:

We write on behalf of the parties in the above-referenced matter. Pursuant to Your Honor's directive at the parties' July 25, 2013 conference and your subsequent related Order (dkt. entry no. 417), the parties propose the following schedule for completing discovery with respect to the alleged damages of the individual Named Plaintiffs (Matt Ravenell, Tyler Talkington and Travis Lubbers) in the above-referenced action:

- Counsel for Plaintiffs will serve any additional discovery requests related to alleged damages in connection with the retaliation claims of Tyler Talkington and Travis Lubbers by August 30, 2013; and
- Counsel for Plaintiffs agree to supplement the relevant discovery requests already served by Defendants and related to alleged damages in connection with the retaliation claims of Tyler Talkington and Travis Lubbers by August 30, 2013.

As counsel for Defendants confirmed with Plaintiffs' counsel during their August 13, 2013 telephone call on these issues, Defendants have already produced complete payroll records for Matt Ravenell, Tyler Talkington and Travis Lubbers.

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We appreciate the Court's attention to this matter.

Respectfully submitted,

/s/ Kimberly J. Gost

cc: Counsel of Record, via ECF